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September 20, 2022

**VIA ECF**

Honorable Frederic Block  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Greco v. City of New York, et al.  
Docket No. 22 CV 5109 (FB)(RLM)

Dear Judge Block:

I am an Assistant Corporation Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for defendants City of New York, and Keechant L. Sewell ("City Defendants") in the above-captioned matter. I write to respectfully request a 60 day extension of time, from September 22, 2022 to November 21, 2022, for City Defendants to respond to the Complaint. This is the City Defendants' first request for an extension of time to respond to the Complaint and Plaintiff's counsel consents to this request.

Plaintiff, a former New York City Police Department ("NYPD") Police Officer, alleges that defendants violated his First Amendment rights by investigating and subsequently terminating him "due to his personal 'familial and 'political' relationships with Roger Jason Stone, Jr., Kristin M. Davis, members of the OATH Keepers, Proud Boys and others who support Trump's American and the political paradigm of Making America Great Again." See Complaint at Introduction. Plaintiff further alleges that this retaliation is part of a "forty year" practice of the NYPD to "intentionally 'abuse' its statutory authority and the internal disciplinary process to discriminate against . . . disenfranchised members of the department including [Plaintiff] because of their race, gender and 'political' viewpoints." Id. at 90.

In order to respond to these allegations, I must identify, locate and interview those persons with knowledge of the allegations set forth in the complaint and locate and review any documents relevant to Plaintiff's claims. The requested extension will permit this office with

sufficient time to do so. Additionally, the requested extension is necessary because this office has not yet completed its investigation pursuant to General Municipal Law Section 50-k concerning representation of Defendants Hart, Cutter and Orenstein. These three defendants are current or former New York City employees and therefore may be entitled to representation by this office. In order to preserve these individual defendants' rights while this inquiry is made, this office also requests an extension to November 21, 2022 on behalf of defendants Hart, Cutter and Orenstein. The requested extension will allow this office to conduct its investigation pursuant to Section 50-k and make a representation determination in advance of responding to the complaint. In this way, should representation be undertaken of all individual defendants, this office can respond on behalf of all defendants it represents at once rather than submitting piecemeal responses.

Accordingly, I respectfully request that City Defendants' time to respond to the Complaint be extended to November 21, 2022 and that a corresponding extension be granted to Defendants Hart, Cutter and Orenstein. City Defendants thank the Court for its consideration of this request.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "A O'Connor", written in black ink.

Andrea O'Connor  
Assistant Corporation Counsel

cc: Eric Sanders (by ECF)